

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSE TORREZ

No. 22 CR 223

Judge John F. Kness

GOVERNMENT'S UNOPPOSED MOTION TO AMEND
THE SUPERSEDING INDICTMENT

The UNITED STATES OF AMERICA, by its attorney, MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, respectfully submits this unopposed motion to amend the superseding indictment to correct a scrivener's error in Count Nine. In support of its motion, the government states as follows:

1. On October 26, 2023, the grand jury returned a superseding indictment against defendant Jose Torrez charging him one count of knowingly enticing a minor to engage in sexual activity for which defendant could be charged with a crime, in violation of United States Code, Section 2422(b), four counts of crossing a state line with intent to engage in a sexual act with a minor, in violation of Title 18, United States Code, Section 2241(c), four counts of transporting a minor in interstate commerce with intent to engage in sexual activity for which defendant could be charged with a crime, in violation of Title 18, United States Code, Section 2423(a). Dkt. 79.

2. In preparing for trial, the government discovered a scrivener's error in a statute listed in Count Nine of the superseding indictment. Specifically, Count Nine

currently charges the following:

The SPECIAL JANUARY 2023 GRAND JURY further charges:
On or about February 2019, in the Northern District of Illinois, Eastern
Division,

JOSE TORREZ,

defendant herein, knowingly transported and caused to be transported
C.L., who had not attained the age of 18, in interstate commerce from
the State of Illinois to the State of Arkansas, with intent to engage in
sexual activity with C.L. for which defendant could be charged with a
criminal offense, namely, Rape, in violation of Ark. Code § 5-14-105;

In violation of Title 18, United States Code, Section 2423(a).

3. The Arkansas statute citation listed in Count Nine of the superseding
indictment, “Ark. Code § 5-14-105,” is incorrect. The correct address citation is “Ark.
Code § 5-14-103.”

4. The government respectfully moves to amend Count Nine of the
superseding indictment to state the correct citation of the Arkansas statute, Ark.
Code § 5-14-103.

5. The government has conferred with counsel for defendant, who does not
oppose this motion.

6. For the foregoing reasons, the government respectfully requests that this Court grant the government's motion to amend Count Nine of the superseding indictment.

Respectfully submitted,

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